



CLEAN WATER ACTION

Transmitted via email: green.chemistry@dtsc.ca.gov

June 5, 2007

Maureen Gorsen
Director
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Dear Ms. Gorsen,

On behalf of Clean Water Action and our 20,000 California members, I wish to express our support for the development of the Green Chemistry Initiative. We applaud DTSC's desire to take a leadership role in developing green chemistry in our state and look forward to working with you to create sustainable models of production that will result in safer jobs, better products, a cleaner environment, and healthier communities.

Clearly, the current structure by which we regulate and use chemicals is not sustainable. Without a shift toward prioritizing protection of our workers, our communities, and our environment, we will continue down a path that will lead to degradation of public health, our neighborhoods, our water resources, our air quality, and our economy. We will incur greater and greater costs related to clean up, product and toxin disposal, and even medical care, and we will lose our competitive advantage in the global marketplace. Green chemistry offers one tool to avoid this scenario and realize a win-win situation by which our people remain healthy, our communities are safe, and our economy grows.

Perhaps the most striking benefit of green chemistry is the economic advantages it can create for California. Its development and implementation will allow our current industries to compete and even take the lead in a global marketplace that is experiencing more and more regulation of toxic chemicals. However, we also believe that by investing in and encouraging green chemistry initiatives in the state, both private and public, we can create economic opportunities for California in much the same way as we have done through our leadership in high tech and even stem cell research—but in an environmentally sound way. We therefore encourage DTSC to focus on exploring and creating such economic opportunities through investment in research, development of green chemistry expertise within the state, as well as the creation of regulations and incentives to move current industries toward green chemistry based production models and attract new business ventures to the state. In addition, we want to ensure that private green chemistry investment by California based investors supports these efforts, instead of focusing on initiatives in other states; a situation that has already happened. We therefore encourage the department to create relationships with the private investment community, to ensure that they help build a greener economic future for California.

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Specifically we would suggest the following be incorporated into the Green Chemistry Initiative:

- 1) A joint effort with California universities (public and private) to develop green chemistry programs with the aim of fostering research on:
 - environmental and public health impacts of chemicals and chemical processes;
 - safer alternatives;
 - new methods to comprehensively assess safety/toxicity;
 - the economic implications for moving to more sustainable industrial practices, including an assessment of the external costs of pollution such as medical expenses, lost work hours from injuries, impacts on children, and educational costs related to environmental health problems;
 - market analyses (both the consumer and the market between companies such as end users or product manufacturers and their suppliers) that will enable us to define and exploit social and economic factors what will drive change.
- 2) A program to help create a green work force and address the current dearth of experts to carry green chemistry programs forward through the afore mentioned university programs and by facilitating training for industry leaders on the economic and productivity advantages of shifting to safer materials and processes, worker training at all job levels, developing educational investment, and ensuring just transition for workers displaced by new technologies.
- 3) A policy and regulatory structure that shifts the burden of proof of safety (environmental and human health) on to manufacturers and users of toxic chemicals. This involves requiring comprehensive information on how chemicals are being used, where they are being sent and how, and any potential health impacts through use in products, proximity to chemical processes, or disposal practices on the general public, workers, vulnerable populations such as children, and ecosystems. In the face of scientific uncertainty, health and the environment should be prioritized and potential negative impacts be considered using a precautionary model when making decisions, including taking chemicals off the market when safety cannot be demonstrated.
- 4) The incorporation of environmental justice into decision making. This involves considering the cumulative impacts on communities that bear a disproportionate burden from pollution and environmental degradation as well as exposures from low paying, chemical intensive jobs when making decisions about chemical use, management, and disposal. It also includes proactively reaching out to, and including members of these communities in the very development of the Green Chemistry Initiative and the actions and decisions that come out of the program.
- 5) A program to explore and implement state investment in real world green chemistry initiatives to develop environmentally sound and safe products, industrial processes, and jobs. Such a program should also develop parameters for private enterprises and encourage private venture capital for California based businesses and research facilities.
- 6) A program of public education that raises awareness of the potential impacts of toxic chemicals in products, the current alternatives when they exist, companies that are integrating green chemistry in their businesses and products, and other issues that can motivate consumer decisions.

We appreciate this opportunity to provide some initial thoughts about this new and exciting program. We hope to continue to share our perspectives with you as it moves forward.

Sincerely,

Andria Ventura

Andria Ventura
Program Manager